

January 20, 2003

Environmental Protection Agency
Office of Enforcement and
Compliance Assurance
MC 2222A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Attention: Rebecca Kane

Re: ECHO Comments

Dear Ms. Kane

Unimin Corporation is an industrial mineral mining and processing company with multiple operations across the US. Based upon our review of the ECHO website and the comparison of the data reflected on the site with our records, we have the following comments:

1. Meaningful/Useful Information. The site gives the casual observer the impression that sites are operating illegally without permits when in reality the relevant state is sitting on a permit application and we are operating legally under the "expired" permit. This makes us look inept or worse, when viewed by the public. This impression is given by providing the expiration dates of permits, but not providing any information as to dates of renewal application submission and/or reason for delay in issuance of new permit. In some cases, we have operated for years under old permits because a state is too busy to review our timely filed renewal application.
2. Ease of Navigation. The site is easy to navigate.
3. Help Text. Overall, the site had too much usage of acronyms for the general population. More plain English (even though there is a data dictionary) would make the site more user friendly.
4. Improving the Site. Facilities have an "EPA source I.D. number" that we were unable to track from our own files. It should be clear where this number comes from and how we can check to see if it is correct. Also, see other comments.

5. Regulated Community Questions:

- a) Accuracy. The data is not current or completely accurate in many cases. We found a number of instances of a site acquired by Unimin years ago still showing up under its prior owner. We also found numerous entries for the same site (probably most prevalent problem), violations identified at wrong site (was at site x, but ECHO said was at site y), incorrect SIC codes, incorrect zip codes, and incorrect contact information. While the process of inputting data to correct errors seems fairly straightforward (we submitted corrections, but haven't seen corrected yet), it is unfair to industry for EPA to use obviously (if anyone really reviewed) inaccurate data, in many cases, and then force industry to police the data if they want it accurate. In sum, the data has not been reviewed thoroughly enough by EPA/States to put it up on a public website.
- b) Error Reporting. Only complexity/problem was having to go through two different EPA contacts to correct errors regarding one facility. There should be a "one window" approach to correcting errors. Otherwise, reporting was straightforward. We have not yet seen whether and how quickly corrections actually get reflected on the site.

If you have any questions, please feel free to contact me at Unimin Corporation, 258 Elm Street, New Canaan, CT 06854, (203)-966-8880 or dbradley@unimin.com for clarification.

Very truly yours,

UNIMIN CORPORATION

Andrew G. Bradley
Vice President/
Environmental Affairs